



WORLD INSTITUTE ON DISABILITY

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The Honorable Magalie Roman Salas, Esq.
Secretary, Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

RECEIVED
FEDERAL COMMUNICATIONS COMMISSION
NOV 16 1999

November 13, 2000

RE: Application by SBC to provide In-region, InterLATA
Service in the States of Oklahoma and Kansas

Dear Secretary Salas,

The World Institute on Disability (WID) is a non-profit public policy center dedicated to the promotion of independence and full inclusion in society of people with disabilities. Founded in 1983 by leaders of the Independent Living/Civil Rights Movement for people with disabilities, WID is committed to transforming policy into action.

Over the past 15 years, WID has earned an excellent reputation for high quality research and public education on a wide range of issues that impact people with disabilities. Our Board of Directors and staff, over half of whom are people with disabilities, consist of well-known national leaders in the disability field as well as leaders in industry, government, and social services.

WID has been very involved in telecommunications policy, especially as it relates to access to a variety of forms of communication to persons with all kinds of disabilities. We have worked towards the development of public policy in legislation and regulations that will advance this goal, and we have also worked with private companies that are willing to

Magalie Roman Salas

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pursue this goal irrespective of government regulation. So far, not that many private companies have stepped forward to seriously address the needs of our constituencies voluntarily. We anticipate that corporate attention to accessible technology and universal design will increase as a result of government mandates such as Section 255 of the Telecommunications Act of 1996, and there are indications that this is beginning.

One company that has taken the initiative to make its products and services accessible to customers with disabilities is SBC. SBC has established an Advisory Group for People with Disabilities that includes disability community and technical representatives. That advisory group has worked with the company over several years to take a broad look at the company's activities and products.

As a result of this attention and work, SBC has adopted a Universal Design policy that applies throughout the company. SBC has developed an internal checklist that is used during the product development process to examine many different aspects of accessibility. SBC vendors are expected to ensure that products they supply to the company also meet these expectations. SBC has made consumer billing information available in alternative formats for consumers who are blind or visually impaired. There are many specific examples of how SBC has implemented its Universal Design Policy and I expect this will continue in the future.

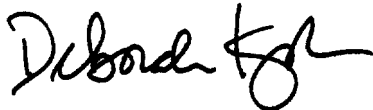
WID supports the comments filed in this matter on April 26, 2000, by the Campaign for Telecommunications Access and 45 other disabilities rights and older adult organizations and advocates. One of the benefits offered to consumers as long distance companies begin to compete for the provision of local service, and as local telephone companies get into the long distance market, is the opportunity to receive a host of communications services from one provider in one bill. For consumers with disabilities, this could be a significant improvement, especially for people who have difficulty reading and/or understanding billing information, opening envelopes, or writing checks.

It would be perversely ironic if the only companies that offered this kind of one stop/one bill service were companies that did not offer a wide

range of accessible products and services. At this time, SBC is one of the few companies that has a Universal Design policy and that can point to already-existing accessible products and services, as well as customer billing. Customers with disabilities are a significant portion of the consumer market, and this group will grow as our population ages. It is important for regulators to take into account the practical impact of regulatory decisions on this major group of consumers. If products and services are not accessible, the fact that new competitors are able to offer them is of little importance for customers who need that accessibility. The fact that Section 255 will ultimately result in more accessible products and services is positive, but right now, customers with disabilities need to be served by those companies that can meet their needs today.

For these reasons, we urge you to respond favorably to SBC's application.

Sincerely,

A handwritten signature in black ink, appearing to read "Deborah Kaplan", with a stylized flourish at the end.

Deborah Kaplan
Executive Director